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August 21, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Thomas J. Sugrue
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Unintentional 911 Calls from Mobile Phones

Dear Mr. Sugrue:

This letter responds to your inquiry of August 6, 2002 regarding the actions AT&T Wireless Services, Inc. ("AWS") is taking to reduce the number of unintentional calls to 911 that are made by AWS subscribers.^{1/} AWS appreciates the importance of doing all it can to ensure that the number of unintentional 911 calls from our customers is minimized. Your specific questions are answered below.

Q1) Whether AT&T Wireless has communicated to its handset manufacturers its desire that mobile phones not be preprogrammed to dial 911 by pushing a single button on the keypad?

A1) Yes. AWS has worked with its handset vendors to ensure that all handsets are shipped to AWS with the auto-dial for 911 pre-programmed to "OFF." While AWS cannot prevent a customer from using the speed dial function to preprogram any number into his or her phone, all handsets come from the factory with no emergency numbers preprogrammed.

Q2) Whether AT&T Wireless instructs its personnel to deactivate the auto-dial 911 feature if it comes preprogrammed on certain mobile phones?

A2) The auto-dial 911 feature does not come preprogrammed on any AWS handset.

^{1/} AWS responded to a similar inquiry from the Wireless Telecommunications Bureau via email on February 19, 2002.

Q3) The extent to which AT&T Wireless provides customers with information regarding the unintentional 911 calls problem, both for existing handsets and new handsets.

A3) AWS' website advises customers "DO NOT enter 9-1-1 into your phone's memory. If certain buttons on your phone are accidentally pressed, you could call 9-1-1 accidentally. This distracts the emergency operator, who is trying to answer real emergency calls. If your phone has a 'one button' emergency feature, make sure it is disabled to avoid accidental calls. Your sales representative can show you how."^{2/} AWS also devotes a page in its "Welcome Guide" (the instructional booklet included with each handset that advises customers how to activate service and set up voicemail systems) to emergency calling. On that page, customers are advised "Remember: Lock your keypad to prevent unintended calls to 911." In addition, the June 2002, February 2002, and October 2001 issues of Wireless Today, a newsletter distributed to the majority of AWS subscribers, included the following information about preventing accidental 911 calls:

Every year 911 operators receive thousands of "phantom" calls - calls made unintentionally by wireless users. That's because many phones are automatically programmed to call 911 when the 1 or 9 key is held down. A wireless user may accidentally call 911 when a phone is bumped in their purse, briefcase, or pocket. Since every call to 911 requires a call back for verification, phantom calls may potentially prevent real emergency calls from getting through.

To avoid an accidental 911 call, protect your keypad when placing your phone with your personal belongings, or better still, lock your keypad whenever you leave your phone on. You may also refer to your manual to disable the preprogrammed 1 or 9 key.^{3/}

Q4) Whether AT&T Wireless itemizes 911 calls on its customers' bills to alert them that they may be placing 911 calls unintentionally?

A4) No. AWS does not include information regarding non-billed calls on its customers' bills. AWS' billing systems currently are not designed to capture non-billed call data.

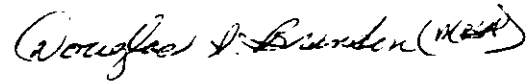
^{2/} See "Dialing 911: Customer Tips for 9-1-1 from AT&T Wireless"
<<http://www.attwireless-welcome.com/cs911Free.asp>>.

^{3/} AWS is in the process of modifying the information in its Welcome Guide and future editions of Wireless Today to reflect the fact that the auto-dial 911 feature does not come preprogrammed on any AWS handset.

Thomas J. Sugrue
Chief, Wireless Telecommunications Bureau
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Please do not hesitate to contact me if you need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Douglas I. Brandon (WTTB)".

Douglas I. Brandon

✓cc: Andra Cunningham, Policy Division, WTB

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Federal Communication Commission
Bureau / Office

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